North American Numbering Plan Administrator (NANPA)

2003 Operations Review

March 9, 2004

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- 2003 Overview
- Central Office Code Administration
- Other NANP Resource Administration
- NPA Relief Planning
- NRUF
- NANPA Forum and Other Activities

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2003 Overview

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- **Number Optimization and Administration**
  - Experienced full impact of FCC number optimization efforts
    - Rollout of 1K block pooling completed
    - Wireless number pooling
    - Increased CO code utilization requirement to 70%
  - Result is lowest quantity of CO codes assigned since NeuStar assumed the NANPA/CO code function
    - 15K in 2000, 10K in 2001, 7K in 2002 and 3K in 2003
  - No new geographic area code assigned due to NPA exhaust
  - More 500/900 NXXs returned than assigned

- **NANPA Procurement and Award**
  - NANPA RFP released in March 2003 - proposals submitted in May
  - Awarded to NeuStar in July 2003
  - New system (NAS) requirements, design, development and testing took place over 2H03
    - NANPA staff directly involved with this development effort
    - During this time, NANPA continued to deliver consistently high quality service in all areas of responsibilities

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- **NANPA Management and Operations**
  - Changes in NANPA staff in response to evolving number administration environment
    - John Manning assumed NANPA Director role
    - Elimination of two Senior Code Administration positions
    - Reduction in NPA Relief Planners and associated management
  - Operating under both a new NANPA contract and existing NANPA order
    - System developed under contract; NANPA operations governed by order
  - Primary focus remained excellent customer service
    - Responsive to industry needs
    - Initiated appropriate action with regulators when necessary

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Central Office Code Administration 2003 Operations Review

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- Total Code Requests Processed in 2003 – 17,459
  - 3,245 assignments
  - 9,781 changes
  - 2,117 denials
  - 1,788 disconnects
  - 528 cancellations
  - 0 reservations
- Delivered consistently high quality service
  - 99.84% of all applications processed in 10 working days or less
  - 99.99% of all applications processed without code rejects
  - All code application errors identified when responding to applicant
- Created Code Administration Tips (CATs) to assist applicants when applying for CO code resources

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- Code Administration System (CAS)
  - A total of 90 CAS trouble tickets were processed in 2003
    - Over three quarters dealt with non-system functionality issues (e.g., need password, NXX availability, reclamation questions)
  - CAS enhancements were put on hold with NANPA procurement
- Returned Codes with Ported TNs
  - Since January 2003, the number of returned codes with ported TNs has steadily declined
    - In 2003, NANPA has found new code holders for 86 of the 90 disconnect Part 1s – a 96% success rate!
    - Only 4 codes having 97 ported TNs were disconnected up through December
    - NANPA found a home for over 35,600 ported TNs
- Abandoned Codes
  - NANPA distributed 8 notices to states concerning codes
- Implementation of FCC NRO 3rd
  - On June 30, 2003 the utilization threshold rose to 70%
  - Clarified and posted "safety valve" provision on a state basis
- Provided daily/weekly/monthly Part 1 and Part 3 reports to states

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Date of Comparison	Discrepancies				Percent Reduction in Total Discrepancies
	Code State	OCN	Rate Center	Total Discrepancies	
August 2002	2520	3754	1222	7496	
March 26, 2003	1935	2875	968	5778	22.92%
May 9, 2003	1745	3015	718	5478	26.92%
June 12, 2003	1763	2727	675	5165	31.10%
July 8, 2003	1824	2771	670	5265	29.76%
August 8, 2003	1651	1712	668	4031	46.22%
September 1, 2003	1585	264	663	2512	66.49%
October 1, 2003	1562	464	655	2681	64.23%
November 1, 2003	1386	307	653	2346	68.70%
December 1, 2003	1280	354	650	2284	69.53%
January 1, 2004	1271	384	647	2302	69.29%
February 1, 2004	1152	401	540	2093	72.08%

- Benefits derived from data integrity
  - More accurate resource assignment information
  - Resources made available for assignment that were otherwise previously unavailable
  - Delays NPA and NANP exhaust
  - Reduces chances of denial of additional resources when not warranted
  - Reduces opportunity for the assignment of resources to carriers when such assignment is not appropriate

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Benefits derived from data integrity (cont.)

- Identification of assignment anomalies
  - Billing codes
  - Rate center inconsistencies
  - Identify potential issues for guideline revision
- Identify abandoned codes – allowing for the process of reclamation to expand
- Identify areas in the Guidelines and with industry practices that need to be addressed
  - Issues/contributions provided for INC consideration

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- **Monthly Quality Report**
  - Performance measurements (e.g., 10 day processing, code conflicts, phone calls, AOCN responses, reclamation activity)

- **Quarterly Code Administration Survey**
  - Customer service focused

- **Neutrality Audits**
  - Neutrality requirements

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- 2003 Monthly Quality results continue to show very high operational performance level
- Processed 99.9% of code requests within 10 business days
  - Out of 3,245 assignments, only two (2) code rejects (99.9%)
- Processed 100% of AOCN requests within 5 business days
  - Total AOCN inputs – 8,012
  - Number missed 5 days - 0
- Initiated reclamation on codes within 6 mos. of the effective date 99.3% of the time
  - Quantity of reminder notices distributed – 2,082
  - Codes recovered – 673
- Returned 100% of calls within 1 business day - includes Code Administration, AOCN and Reclamations group

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- **Code Reports**
  - Posted CO code reports regularly to NANPA website
    - CO code assignments
    - Part 3 Disconnects
    - Central Office Codes pending industry review for return to available status
  - Standard reports to assist NPA Relief Planners
    - Unavailable code activities
  - Reports requested by states for Part 1 and Part 3 information
    - 27 states receive the Part 1 report daily, weekly or monthly
    - Developed and implemented a Part 3 report delivered to 19 participating states
  - Reports requested or ordered by state commissions on a bi-weekly, monthly or quarterly basis - TN, CT, MD, NY, OK, CA
  - Utilized client contact list for NOWG Annual Survey announcement in October 2003 and reminder in January 2004

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- **Quarterly Code Administration Customer Survey**
  - 4 question survey focusing on the following areas:
    - Knowledge and understanding of guidelines
    - Courtesy and responsiveness
    - Overall satisfaction
  - Sent survey to applicants every quarter (except 4Q03 due to annual survey)
  - Received 65 responses
  - Overall average result was 4.6 out of 5.0

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- ## 2003 Quarterly Survey Results

Code Administration Customer Satisfaction Survey Results

	1Q2003	2Q2003	3Q2003
Responses Received	23	21	21
Survey Results	4.4	4.7	4.7

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- **Neutrality Audit**
  - Quarterly neutrality audit conducted by Ernst & Young
  - Purpose: Ensure NANPA is not unfairly treating one service provider or group of service providers by delaying action on their applications.
  - NANPA required to provide a written explanation if time interval exceeds industry guidelines.
  - Auditor examines NANPA CO code application processing to determine if:
    - 10 day processing window is being followed
    - Reclamation procedures are being followed as defined
    - Effective corrective actions taken when necessary
  - In 2003, NANPA received a positive report from the independent auditor concerning our neutral CO code administration activities.
    - Auditors found no issues with regard to processing CO code applications or our reclamation activities.

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- Ensure Code Administration compliance with Industry Guidelines, Requirements and Regulations
  - Assessed changes to the COCAG and orders/clarification issued by federal and state regulators – distributed changes and updates of guidelines to the industry via DDS and exploder lists
  - Standard verbiage for Part 3 responses – continued to add and modify as needed

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- **Provide Internal Code Administration Support**
  - Continued to identify and coordinate training needs
    - Training sessions in 2003: Code expedites, OCN changes, NRUF, Code return process, splits and overlays, splits and overlays changes and returns, changes to the COCAG
  - Developed and facilitated continuous training for Code Administrators as guidelines and mandates changed
  - Job aid overview at weekly staff meetings as needed for changes and updates
  - Ongoing upkeep of Methods and Procedures Manual – includes documented processes and Job Aids
  - New job aids and manuals preparation for NAS

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- ## CAS
  - For 2003, approximately 50 % of applications being submitted via CAS
  - Help Desk
    - A total of 90 CAS trouble tickets were processed in 2003
    - At the end of 2003, there are no outstanding trouble tickets.

- ## NAS
  - Internal system testing conducted 4Q03
  - User acceptance testing conducted week of December 22, 2003

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- Continuation of Implementation of FCC NRO Orders
  - June 30, 2003 – NANPA implemented the new threshold for growth codes increased to 70%
  - NANPA continued management of state-specific utilization thresholds
  - Implementation of the safety valve – Service providers that do not meet FCC requirements can seek a waiver from the state.
    - NANPA posted a job aid to assist service providers with this process
    - NANPA posted report detailing specific state requirements for processing safety valve requests (i.e., approach state before/after code denial from NANPA)
  - End of 2003 - 39 NPAs in jeopardy as compared to 41 at the end of 2002
    - 34 NPAs are in rationing with individual lotteries and procedures held monthly
  - Code reclamation is now the responsibility of State Public Utility Commissions or the FCC
    - Thirty-four states participate in reclamation
    - In 2003, NANPA recovered 673 codes through the reclamation process

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- Provided consistent, high quality, neutral service

- Made significant progress in improving data integrity

- Continued efforts to maximize availability of CO codes

- Provided timely, accurate reports to states and industry on code assignments

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Other NANP Resource Administration
2003 Operations Review

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- One (1) NPA assignment was made in 2003
  - NPA 684 in American Samoa.
  - One (1) NPA (445) was returned but remains reserved for 215/267 relief
- Three (3) new NPAs went into service in 2003.
  - Over past three years, 9 NPAs 2002, 26 NPAs in 2001, 14 in 2000 placed in service
- 39 NPAs await introduction, most suspended or pending
- 309 NPAs currently unassigned
  - 48 Easily Recognizable Codes (ERCs)
    - 11 ERCs reserved
    - 37 available
  - 261 General Purpose NPA Codes
    - 232 NPAs reserved
    - 29 NPAs available (up one NPA from 2002)

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- 886 and 889 NPAs (Non-Dialable Toll Points) were returned July 2003 and set aside for toll free service

- 52X reservation extended at the request of INC/OBF through February 29, 2004 – presently verifying that these codes can be returned to inventory

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- N11 Codes
- Vertical Service Codes (VSCs)
- 800-855-XXXX (total of 38 assigned)
- ANI II
- 456-NXX (total of 8 assigned)

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- As of 12/31/03
  - 819 FG B CICs assigned
  - 1,180 FG B CICs available for assignment
- 3 FG B assignments in 2003 (average monthly assignment rate of .25 codes per month)
- 18 FG B CICs reclaimed in 2003
- There is no concern relating to the exhaust of the FGB CIC resource based on this rate of assignment.
- Assigned only in the 0/1XXX and 5XXX ranges, with a limit of 5 FGB CICs per entity.

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- As of 12/31/03
  - 2,428 FG D CICs assigned
  - 7,351 FG D CICs available for assignment
  - 220 FG D CICs not available for assignment
    - CICs 9000-9199 (intra-network use), 5000 (testing), X411 and 411X (unassignable at direction of FCC)
- 77 FG D CICs returned/reclaimed in 2003
- 191 FG D CICs assigned in 2003
  - 38 CICs assigned to switchless resellers
  - Average monthly assignment rate over last 12 months is 16 CICs/month
    - Projected exhaust (with the continued limit of 2 FGD CICs per entity in force) is 38.3 years

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- "Abandoned" CICs are an increasing problem – Companies go out of business, cease operations – but fail to return their unused CIC assignments to NANPA
- Assignees fail to keep NANPA advised of mergers/acquisitions, company name changes, new addresses, etc.
- Inaccurate/invalid data being supplied to NANPA on LEC Semi-Annual Access/Usage reports
  - LECs are reporting access/usage on unassigned CICs
  - NANPA's 60-day reclamation letters frequently reveal valid, but unreported access
  - LECs are not updating their billing records to reflect merger/acquisitions, ACNA changes, reclaimed/returned CICs
  - LECs are frequently unable to provide current contact information for assignees NANPA is unable to locate by letter or phone

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- Data provided in these Semi-Annual LEC reports is decreasing in value to NANPA due to the high percentage of errors and invalid information being discovered. NANPA uses the information in the LEC reports as the sole basis for reclamation of unused CICs, and as an indicator of CICs not used in accordance with the CIC assignment guidelines. If this important administrative tool is lost, NANPA will no longer have the ability to monitor CICs. If ongoing CIC reclamation stops, the lifetime of the CIC resource will no doubt be seriously impacted.

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- As of 12/31/03
  - 519 codes assigned (65% of total resource).
  - 272 codes available for assignment
  - 12 codes are unavailable for assignment (i.e., N11, 555, 3 codes "in dispute").
- 11 codes assigned in 2003
- 15 codes reclaimed or voluntarily returned in 2003.
- Based on total assignments over the last 12 months, the average monthly assignment rate is approximately one code per month
  - Based upon current demand, the supply of 500 NXX codes should last for next 24 years.

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- As of 12/31/03
  - 199 codes assigned/reserved (25% of the total resource)
    - 140 actual assignments and 59 codes reserved for Canadian use
  - 593 codes available for assignment
  - 8 codes not available for assignment (N11)

- 3 codes assigned in 2003
  - All were moved from Canadian pool of reserved 900 codes to assigned status

- 7 codes reclaimed/voluntarily returned in 2003
- Based upon current demand, 900 code exhaust is not an issue at this time

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- As of 12/31/03
  - 7,455 "national" assignments
  - 333 "non-national" assignments
  - 1,996 line numbers are available for assignment
  - 116 line numbers remain "in dispute" (requested by multiple applicants during open enrollment)
  - 100 - (0100-0199) Reserved as fictitious non-working numbers for use by the entertainment and advertising industries
- 13 new "National" assignments made in 2003
  - Average assignment rate of one line number per month
- No specific direction was received by NANPA from the FCC/CRTC in 2003 to reclaim 555 resources

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- Since August 2000, when 70% of the total assignable numbers had been reached, line number assignments continue to be limited to one number per entity per application.
  - The average monthly assignment rate dropped from nearly 13 numbers/month in 2002 to one/month in 2003
    - 153 new assignments in 2002 vs. 13 new assignments in 2003
  - Based upon the current demand, 555 line number exhaust is not an issue at this time

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- 99.99% of applications processed within 10 working days
  - Two (2) CIC applications took more than 10 days
- Due diligence required, particularly on CICs
  - Regular attorney involvement on complex decisions
  - Semi-annual CIC reports used as primary source to initiate reclamation
  - Reclamation process includes notification to CIC holder via fedex or certified mail
    - Undeliverable notifications lead to CIC being included on proposed reclamation list to INC (same for 500 and 900 resources)
    - No reply leads to reclamation
    - Follow-up required with CIC holder to determine if CIC is being used in accordance with industry guidelines
- 500/900 NRUF reports used as only source upon which reclamation of these resources is based
- Nancy Fears serves as primary lead for resource administration for these resources (John Manning is backup)
- Guidelines and FCC documents constitute M&P documentation NEUSTAR™